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*Attorneys for Plaintiffs Tamara Rae Larsen
and Riverbend Ranch Equestrian Center, LLC*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

RIVERBEND RANCH EQUESTRIAN
CENTER, LLC, a Utah Limited Liability
Company; and TAMARA RAE LARSEN,
an Individual,

Plaintiffs,

vs.

ROBERT DUVALL, an individual;
ROBERT CARLINER, an individual; WILD
HORSES PRODUCTIONS
ENTERTAINMENT LLC, a Canceled
California Limited Liability Company; and
JOHN DOE DEFENDANTS I - XX,
Defendants.

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: **AMENDED STIPULATED MOTION**
: **FOR AND [PROPOSED] ORDER**
: **GRANTING EXTENSION OF TIME TO**
: **RESPOND AND REPLY TO MOTION**
: **FOR LEAVE TO FILE AMENDED**
: **COUNTERCLAIM**

:
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: Civil No. 2:15-cv-00751-JNP-EJF

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:
: The Honorable Jill Parrish

Pursuant to DUCivR 77-2(a)(4), the parties, by and through their respective counsel of
record, hereby submit the following AMENDED STIPULATED MOTION FOR AND

[PROPOSED] ORDER GRANTING EXTENSION OF TIME TO RESPOND AND REPLY TO MOTION FOR LEAVE TO FILE AMENDED COUNTERCLAIM.

1. On May 4, 2016, the counterclaimants moved for leave to file an amended counterclaim.

2. At the time of the filing, counsel for plaintiffs, Joann Shields, was out of the country and she did not return to her office until May 16, 2016, two days before the plaintiff's response to the motion was due.

3. While out of the country, Ms. Shields was in areas where Internet is spotty and/or inaccessible.

4. The plaintiffs' response date is May 18, 2017, and the defendants' reply date is June 1, 2016 — neither of which date has expired.

5. This is the first request for extension to respond and reply to a motion, and no trial date or other scheduling matters have been set.

6. In light of Ms. Shields' being out of the country when the motion was filed, the defendants stipulated to the extension to allow the plaintiffs adequate time to respond to the motion, which is effectively the same amount of time allowed under the Local Rules.

7. The extension is not sought for, and will not result in, delay of the case.

8. The parties agreed that the defendants would have 21 days to respond

9. The parties therefore jointly request that, based on good cause shown, the time for responding to the motion be extended to May 31, 2016, and the time for replying be extended to June 21, 2016.

CONCLUSION

For good cause shown, the parties request that the current dates for responding and replying to the motion for leave to file an amended counterclaim respectively be extended to May 31, 2016, and June 21, 2016.

DATED this 18th day of May 2016.

Respectively submitted,

SHIELDS LAW FIRM, P.C.

/s/ Joann Shields

JOANN SHIELDS

*Attorneys for Plaintiffs Tamara Rae Larsen
and Riverbend Ranch Equestrian Center, LLC*

STIPULATED TO BY:

DAVIS WRIGHT TREMAINE LLP

/s/ Kelli L. Sager (Signed by Joann Shields with permission of Kelli Sager)

KELLI L. SAGER
DIANIA PALACIOS

*Attorneys for Defendants Robert Carliner, Robert Duvall and
Wild Horses Productions Entertainment LLC*

ORDER

Upon the parties' stipulation, and for good cause shown, the Court hereby GRANTS the motion and, regarding the motion for leave to file an amended counterclaim, ORDERS that the time for responding is extended to May 31, 2016, and the time for replying is extended to June 21, 2016.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE